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July 26, 2022

VIA ECF

Honorable Stephanos Bibas
U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: *Elmagin Capital, LLC v. Chen et al*, No.: 2:20-cv-02576-SB (E.D. Pa.)
Request for Extension of Time to Oppose New Trial Motion

Dear Judge Bibas:

We write on behalf of Defendants to respectfully request an extension of time to submit Defendants' Opposition Brief to Elmagin's Motion for a New Trial [Dkt. 328] to and including August 26, 2022. We have conferred with Counsel for Elmagin, and Elmagin consents to this extension.

As explained to Elmagin's Counsel, we believe such extension is appropriate not only because Elmagin had over 75 days in which to prepare its New Trial motion, but also due to Defense Counsel's work and personal schedules. In this period, Defense Counsel's schedule includes the undersigned's taking three depositions in the first week of August in a matter before Judge Beetlestone (which were rescheduled to accommodate the trial in this action), as well as a 10-day trip with extended family that was reserved a year in advance.

Counsel for Elmagin has told us that they may seek leave to file a reply and for an extension of time to submit such reply beyond the customary seven days. We are, of course, amenable to an extension should they request it.

Respectfully,

A handwritten signature in black ink that reads "Nicole D. Galli". The signature is fluid and cursive.

Nicole D. Galli

cc: All Counsel of Record via ECF